

1 Robert F. Hinton (Bar No. 98110)
Helen S. Baek (Bar No. 265514)
2 ARCHER NORRIS
A Professional Law Corporation
3 333 South Grand Avenue, Suite 1700
Los Angeles, CA 90071
4 Telephone: (213) 437-4000
Facsimile: (213) 437-4011
5

6 Attorneys for Defendants,
ADVANCE CULTURAL EDUCATION AND
TRAINING CORPORATION, a California
7 corporation, NAPAT VORAPUVADOL A/K/A
NAWACHOL BOONTHAM, NARIN
8 NATHRADOL, A/K/A MONNOPA
KOMOLKETRUCK, and SUPAWADEE
9 POONDEJ

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION
13

14 I.E.I. COMPANY LIMITED, a
Thailand corporation;
15 INTERNATIONAL EDUCATION ,
INC., a Seychelles corporation,,
16

17 Plaintiffs,

18 v.

19 ADVANCE CULTURAL
EXCHANGE TRAINING
CORPORATION, a California
20 corporation, initially named herein as
"Advance Cultural Education and
21 Training Corporation", NAPAT
VORAPUVADOL, a/k/a Nawachol
22 Boontham, an individual; NARIN
NATHRADOL, a/k/a Monnipa
23 Komolketruck, an individual;
SUPAWADEE POONDEJ, a/k/a
24 Supavadee Poondej, an individual;
DOES 1 through 10, inclusive,,
25

26 Defendants.

Case No. 4:09-CV-05079 PJH

**STIPULATION TO CONTINUE
JULY 7, 2010 HEARING ON
MOTION TO TRANSFER VENUE;
DECLARATION IN SUPPORT
THEREOF; ORDER THEREON
[PROPOSED]**

27 Defendants, Napat Vorapuvadol, Narin Nathradol, Supawadee Poondej and

28 Advance Cultural Exchange Training Corporation ("Defendants") and Plaintiffs,

1 I.E.I. Company Limited and International Education, Inc. ("Plaintiffs"), by and
2 through their undersigned counsel, stipulate and agree as follows:

3
4 Pursuant to Civil Local Rules 6-1(b), 6-2(a) and (b), 7-7(b) and (d), the
5 parties, by and through their respective attorneys of record, hereby stipulate and
6 agree that the hearing date on Defendants' Motion to Transfer Venue be continued
7 until Wednesday, August 18, 2010 and that Defendants' Reply, if any, be continued
8 pursuant to Civil Local Rule 7-7(d). Defendants' counsel will be out of state (in
9 Texas) in the middle of July.

10
11 This stipulation is made upon the following grounds and based on the
12 following facts and events:

13
14 1. On Wednesday, May 26, 2010, the parties participated in a lengthy
15 mediation session conducted by Mediator Stewart H. Foreman in Department No.
16 17 of the United States District Court, located at 450 Golden Gate Avenue.
17 Substantial progress to resolving the subject litigation was then made. Settlement
18 discussions have continued and are on-going; drafts of the Settlement Agreement
19 have been exchanged and discussed at length; negotiations, however, have taken
20 longer than expected due to clients being in different international time zones. As
21 before, the parties continue to wish to direct their limited time and resources to this
22 task.
23

24 2. Defendants' Motion to Transfer Venue was filed on May 10, 2010.
25 Plaintiffs filed their Opposition on May 26, 2010. The parties submitted one (1)
26
27
28

1 request to continue this hearing. This Court granted same on June 1, 2010.

2 Hearing is currently set thereon for July 7, 2010. Defendants' Reply is not yet due.

3
4 3. As referenced above, the parties hereto have made one (1) prior
5 request for a continuance of this hearing or Motion and this Court granted same.

6
7 4. The only other Stipulation previously requested by the parties in this
8 matter was on December 30, 2009. There, the parties sought leave for Plaintiffs' to
9 file their Second Amended Complaint and an extension of time to respond to same.
10 This Court granted said Stipulation on January 13, 2010.

11
12 5. This immediate Stipulation is requested in good faith and based on the
13 facts above and the attendant Declaration of Robert F. Hinton.

14 6. Respectfully, it is requested that this Stipulation be granted.

15
16 Dated: June 17, 2010

Respectfully submitted,

ARCHER NORRIS, PLLC

By: 

Robert F. Hinton

Attorneys for Defendants, Napat
Vorapuvadol, Narin Nathradol,
Supawadee Poondej and
Advance Cultural Training
Corporation

17
18
19
20
21
22 Dated: June 17, 2010

Respectfully submitted,

KRONENBERGER BURGOUYNE, LLP

By: /s/ Karl S. Kronenberger (per consent)

Karl S. Kronenberger

James V. Weixel, Jr.

Attorneys for Plaintiffs,
I.E.I. Company Limited and
International Education, Inc.

ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

1. Defendants' Motion to Transfer Venue is hereby continued to Wednesday, August 18, 2010, at 9:00 a.m. in Department 3 of this Court;
 2. Defendants' Reply, if any, is due pursuant to Civil Local Rule 7-7(d);
- and,
3. Should the parties reach settlement in this matter, they will promptly notify this Court of same, as required by Civil Local Rule.

Dated: June 18, 2010

The Honorable Phyllis E. Hamilton
United States District Judge

